

Title V

Model General Permit Template

SERIES 1 GAS PLANTS

Template # SJV-GP-1-0

components located at natural gas processing facilities

subject to the requirements of District Rule 4403

commenced construction, modification, or reconstruction on
or before January 20, 1984

This template is designed to streamline the Title V permitting process for natural gas processing facilities meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

San Joaquin Valley Unified Air Pollution Control District

**Final
Title V Model General Permit Template
Series 1 Gas Plants**

Template No: SJV-GP-1-0

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FINAL DECISION DATE:

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

TITLE V GENERAL PERMIT TEMPLATE SJV-GP-1-0

ENGINEERING EVALUATION

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I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process by identifying the federally applicable requirements for certain natural gas processing facilities and to establish permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

II. Template Applicability

The template applies to components which:

- Are located at a natural gas processing facility, and

- Are subject to the requirements of District Rule 4403, and

- Are located at facilities which commenced construction, modification, or reconstruction (see Appendix A) on or before January 20, 1984.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix E. The completed and signed TQF must be submitted with the Title V application.

III. Applicable Requirements

Units may be subject to “federally enforceable” requirements as well as requirements that are enforceable by the “District-only.” Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements (see discussion in section IV). District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to natural gas processing facilities qualifying to use this template, and it is the source’s responsibility to determine any and all applicable requirements to which the source

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is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

Table 1. Applicable Requirements

Rule Category	Rule/Regulation	Citation	Description
A	County Rule	108 ¹	Source Sampling
A	County Rule	108.1 ²	Source Sampling
A	County Rule	110 ³	Source Sampling
A	SJVUAPCD Reg. IV	4403 (formerly 465.3)	Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities
A	SJVUAPCD Reg. II	2520, 9.4.2, 9.5.2, 13.2	Monitoring Requirements, Recordkeeping Requirements, and Permit Shields
B	SJVUAPCD Reg. II	2201	New Source Review Rule
B	SJVUAPCD Reg. II	2520 ⁴	Federally Mandated Operating Permits
C	New Source Performance Standards Subpart KKK	40 CFR 60.630	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants
C	New Source Performance Standards Subpart LLL	40 CFR 60.640	Standards of Performance for Onshore Natural Gas Processing; SO ₂ Emissions
D	SJVUAPCD Reg. I	1081	Source Sampling

Category “A” rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, Compliance, the federally-enforceable requirements from category “A” rules are listed with a discussion of how compliance with these requirements is achieved.

Category “B” rules contain federally enforceable requirements (aside from those listed as Category A) that were not addressed in this template. These may not be all of the federally enforceable requirements for this unit. Requirements from these rules, if applicable, must be addressed by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category “B” listing is included in this table as an informational item to assist applicants in this effort.

¹ Kings

² Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus

³ Madera

⁴ Other than category A requirements

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Category “C” rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category “C” rules. An explanation of the determination of non-applicability of category “C” rules is included in section V, Permit Shield.

Category “D” rules are District rules which are used to show compliance with federally enforceable requirements, and therefore some requirements from these rules will become federally enforceable through the use of this template.

~~Category “C” rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category “C” rules. An explanation of the determination of non-applicability of Category “C” rules is included in this evaluation.~~

~~Category “D” rules are District rules which are used to show compliance with federally enforceable requirements, and therefore some requirements from these rules will become federally enforceable through the use of this template.~~

IV. Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

District Rule 1081

District Rule 1081 has been submitted to the EPA to replace each of the county rules in the SIP: Rule 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern and Stanislaus), and 110 (Madera). Appendix B lists all of the applicable requirements of District Rule 1081 and shows which are included in the rule from each county. This table shows that District Rule 1081 is more stringent than each of these county rules.

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. These requirements are covered by template permit condition #1.

District Rule 2520, 9.4.2 and 9.5.2

Section 9.4.2 requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance. All emission limit requirements addressed in this template are associated with adequate monitoring to assure compliance, therefore no additional monitoring has been proposed.

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Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #22 requires that all records be maintained for at least five years.

District Rule 4403 (formerly SJVUAPCD Rule 465.3)

District Rule 4403 (Adopted April 11, 1991, Amended September 19, 1991, Amended December 17, 1992, Amended February 16, 1995) is a renumbering of the requirements of SIP approved District Rule 465.3.

District Rule 4403 limits fugitive VOC emissions from qualifying components by providing monitoring, recordkeeping, and reporting requirements. The rule requires operators of qualifying units to maintain an operator management plan (OMP) on file with the District. The OMP must include the following:

- 1) a description of any hazard which might affect the safety of the inspector;
- 2) identification of process units which cannot be immediately shutdown for repair of leaks;
- 3) a heavy liquid stream inspection exemption list identifying process components exclusively handling heavy liquids;
- 4) specific identification of the resource commitment to a program to implement, inspect, and repair components;
- 5) a detailed schedule of quarterly inspections to be conducted in accordance with the test method in District Rule 4403, 6.3.4, including identification of components for which an exemption, in accordance with District Rule 4403, 4.0 is requested; and,
- 6) repair procedures, to be used within 15 calendar days following leak detection, which results in compliance with the requirements of this rule.

Because submittal of an OMP is a startup requirement for a source subject to this rule, it is not addressed as a permit condition, but is referenced in some template permit conditions. The monitoring, recordkeeping, and reporting requirements of the rule are addressed in the template permit conditions (see template permit conditions #2 - 21).

Permit condition #14 contains a reference to 40CFR60.18 as a requirement for those facilities using flares as control devices for fugitive emissions. This requirement is addressed in the template developed for flares (SJV-FL-1-0).

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V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit (District Rule 2520, 13.2). Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based.

District Rule 4403 (formerly 465.3); and County Rules 108, 108.1, and 110

By using this template the applicant is requesting a permit shield from requirements District Rule 4403 (formerly 465.3); and County Rules 108, 108.1, and 110 in template permit conditions #23 and #24.

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40 CFR 60 Subpart KKK and 40 CFR 60 Subpart LLL

A permit shield will be granted for 40 CFR 60 Subpart KKK and 40 CFR 60 Subpart LLL because units qualified to use this template are limited to those which were not constructed, modified, or reconstructed after January 20, 1984. A permit shield is granted from these requirements in template permit condition #25.

VI. Permit Conditions

The following conditions will be incorporated into the Title V permit of any facility choosing to make use of template #SJV-GP-1-0:

1. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)]
2. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm above background when measured at a distance of one (1) centimeter from the potential source in accordance with EPA Method 21. [District Rule 4403, 3.3.1]
3. The instrument used for leak detection shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) zero air (less than 10 ppm of hydrocarbon in air) and B) mixture of methane and air at a concentration of about, but less than 10,000 ppm methane. [District Rule 4403, 3.3.1]
4. Each hatch shall be closed at all times except during sampling or attended maintenance operations. [District Rule 4403, 5.2.1]
5. All components, excluding flanges and threaded connections, handling VOCs shall be inspected at least quarterly to detect any leaks. If less than two (2) percent of any component type subject to the prohibitions of this permit, except for pressure relief valves, pumps, and compressors, are found to leak during each of five (5) consecutive quarterly inspections, the inspection frequency for that component type may be changed from quarterly to annual. If any annual inspection shows that two (2) percent or more of all of a specific component type subject to the prohibitions of this permit are leaking, then quarterly inspections of that component type shall be resumed. All flanges and threaded connections handling VOCs shall be inspected at least annually to detect any leaks.[District Rule 4403, 5.2.3]

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6. Each open-ended line shall be sealed with two (2) valves, a blind flange, a cap or a plug except when open end is in use. [District Rule 4403, 5.2.2]
7. Components that are located in inaccessible locations or in areas unsafe for personnel shall be inspected and repaired at least annually and during shutdown, and such components shall be identified in the operator management plan. [District Rule 4403, 5.2.4]
8. All pumps shall be visually inspected at least weekly to detect any liquid leaks. [District Rule 4403, 5.2.5]
9. Each pressure relief valve shall be inspected for leaks within one (1) working day after venting to atmosphere. [District Rule 4403, 5.2.6]
10. Any leaking component shall be identified by the operator affixing a weatherproof, readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until repair and re-inspection document compliance with the requirements of this permit. [District Rule 4403, 5.2.7]
11. Any leak detected on the basis of sight, smell, or sound shall be identified by the operator affixing a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until repair and reinspection document compliance, whether or not operator inspection is otherwise required by this permit. [District Rule 4403, 5.2.8]
12. Any leaking component and any leak shall be repaired to a leak-free condition and reinspected within 15 calendar days. [District Rule 4403, 5.2.9]
13. The number of leaks of a component type shall not exceed one component or two (2) percent of the total number of components of that type that were inspected and that are subject to the requirements of this permit, whichever is greater. For inspections conducted by District personnel to determine compliance with this requirement, the number of components inspected shall constitute a statistically representative sample for each component type. [District Rule 4403, 5.2.10]
14. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. [District Rule 4403, 5.3.1]

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15. If the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [District Rule 4403, 5.3.1.1]

16. Any component leak identified by a Notice to Repair issued by the District shall be repaired and re-inspected as specified in District Rule 4403, 5.2.7, 5.2.8 and 5.2.9 (as amended February 16, 1995). [District Rule 4403, 5.3.2]

17. Each operator shall maintain an inspection log containing, at a minimum, the following: name, location, type of components, and description of any unit where leaking components are found; date of leak detection, emission level (ppm) of leak, and method of detection; date and emission level of recheck after leak is repaired; total number of components inspected, and total number and percentage of leaking components found; Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 4403, 6.2.1]

18. Copies of the inspection log shall be retained by the operator for a minimum of five years after the date of an entry and shall be made available upon request to District personnel. [District Rule 4403, 6.2.3]

19. Samples shall be analyzed by ASTM Methods E-260-73, E-168-67, or E-169-63. Halogenated exempt compounds shall be determined by ARB Method 432. [District Rule 4403, 6.3.1]

20. Emissions of VOC shall be measured by EPA Method 25, 25a, or 25b, as applicable. Halogenated exempt compounds shall be determined by ARB Method 422. [District Rule 4403, 6.3.2]

21. Leak detection shall be performed in accordance with EPA Method 21. [District Rule 4403, 6.3.4]

22. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2]

23. Compliance with permit conditions in the Title V permit shall be deemed compliance with County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin,

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Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

24~~8~~. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4403 (amended February 16, 1995), formerly District Rule 465.3. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

25. The requirements of 40 CFR 60 Subpart KKK and 40 CFR 60 Subpart LLL do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

APPENDIX A

DEFINITIONS
FOR
TEMPLATE # SJV-GP-1-0

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NSPS Definitions

§ 60.15 Reconstruction.

- (a) An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate.
- (b) "Reconstruction" means the replacement of components of an existing facility to such an extent that:
 - (1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, and
 - (2) It is technologically and economically feasible to meet the applicable standards set forth in this part.
- (c) "Fixed capital cost" means the capital needed to provide all the depreciable components.
- (d) If an owner or operator of an existing facility proposes to replace components, and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, he shall notify the Administrator of the proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced and must include the following information:
 - (1) Name and address of the owner or operator.
 - (2) The location of the existing facility.
 - (3) A brief description of the existing facility and the components which are to be replaced.
 - (4) A description of the existing air pollution control equipment and the proposed air pollution control equipment.
 - (5) An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility.
 - (6) The estimated life of the existing facility after the replacements.
 - (7) A discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.
- (e) The Administrator will determine, within 30 days of the receipt of the notice required by paragraph (d) of this section and any additional information he may reasonably require, whether the proposed replacement constitutes reconstruction.
- (f) The Administrator's determination under paragraph (e) shall be based on:
 - (1) The fixed capital cost of the replacements in comparison to the fixed capital cost that would be required to construct a comparable entirely new facility;
 - (2) The estimated life of the facility after the replacements compared to the life of a comparable entirely new facility;
 - (3) The extent to which the components being replaced cause or contribute to the emissions from the facility; and
 - (4) Any economic or technical limitations on compliance with applicable standards of performance which are inherent in the proposed replacements.
- (g) Individual subparts of this part may include specific provisions which refine and delimit the concept of reconstruction set forth in this section.

[40 FR 58420, Dec. 16, 1975]

§ 60.2 Definitions.

Modification: any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

[44 FR 55173, Sept. 25, 1979, as amended at 45 FR 5617, Jan. 23, 1980; 45 FR 85415, Dec., 24, 1980; 54 FR 6662, Feb. 14, 1989; 55 FR 51382, Dec. 13, 1990; 57 FR 32338, July 21, 1992; 59 FR 12427, Mar. 16, 1994]

APPENDIX B

COUNTY RULE / DISTRICT RULE 1081 COMPARISON FOR TEMPLATE # SJV-GP-1-0

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APPENDIX B

Rule 1081 (Source Sampling)

REQUIREMENTS	1081 SJVUAPCD	108 KINGS	110 MADERA	108.1 FRESNO	108.1 MERCED	108.1 S.J.	108.1 TULARE	108.1 KERN	108.1 STANI SLAUS
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	X		X	X	X	X	X	X	X
The facility shall collect, have collected or allow the APCO to collect, a source sample	X	X	X	X	X	X	X	X	X
The source shall have District personnel present at a source test	X								
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	X								
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	X								

APPENDIX C

EPA COMMENTS / DISTRICT RESPONSE
FOR
TEMPLATE # SJV-GP-1-0

TEMPLATE SJV-GP-1-0

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comments regarding gas plant template SJV-GP-1-0 are encapsulated below followed by the District's response. A copy of the EPA's 4/4/97 letter is available at the District. This template is designed for natural gas processing plants.

General Comments:

1. EPA COMMENT

As noted in our comments on previously submitted templates, the District should add a condition to the top section VI, Permit Conditions, to clarify that the definition in any District Rule or federal regulation cited for each permit condition shall apply to that condition.

DISTRICT RESPONSE

This comment was also made by EPA in response to the tank templates. The District has not changed its opinion that the definitions in the rules are sufficient, as they were considered in previously approved templates. However, as noted in the District response to EPA comments on tank templates, a condition has been added to the umbrella template (SJV-UM-0-0) stating that all terms are used as defined in the cited underlying requirement unless otherwise explicitly defined within a particular permit condition.

2. EPA COMMENT

When a District rule is cross-referenced within a permit condition, the adoption and amendment dates of the rule should be included.

DISTRICT RESPONSE

The District believes it is necessary to include only the current adoption or amendment date of the rule being referenced, but not both. The District will include the applicable adoption or amendment date of the rule when it is cross-referenced within a permit condition, so it is clear to the source with which version of the rule it must comply.

3. EPA COMMENT

Correct the rule matrix in Appendix B, County Rule/District Rule 1081 Comparison, to show that Rule 1081 does require the source to provide information and records to enable the APCO to determine when a representative sample can be taken.

DISTRICT RESPONSE

As indicated in the District response to an EPA comment on boiler templates, series 13-25, this matrix has been corrected to show the requirements of the District Rule

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1081 are at least as stringent as the old county rules (i.e. Rule 1081 includes the requirement that the source provide information and records to enable the APCO to determine when a representative sample can be taken).

4. EPA COMMENT

The compliance certification language in the Template Qualification Form must be made consistent with part 70 requirements.

DISTRICT RESPONSE

The compliance certification language will be modified to state, "Based on information and belief formed after reasonable inquiry: 1) the information on this form is true, accurate, and complete, and 2) the facility is in compliance with this template's permit conditions...."

5. EPA COMMENT

If a District Rule has been renumbered, we suggest this is noted wherever the Rule is cited in the Template Qualification Form.

DISTRICT RESPONSE

When a District Rule has been renumbered, the renumbering is discussed in Section IV, Compliance, of the template. The District feels it is unnecessary and confusing to also note this on the Template Qualification Form, since origin and authority for these qualification criterion cite current District Rule numbers and sections.

Template Specific Comments:

6. EPA COMMENT

Rule 2520, section 9.4.2 for periodic monitoring is included as a directly applicable requirement in Table 1 of section IV, Compliance. The District should add a paragraph to clarify why, based on the permit conditions, section 9.4.2 is or is not required to be addressed in this template.

DISTRICT RESPONSE

A paragraph has been added to section IV, Compliance, stating why additional monitoring pursuant to section 9.4.2 is not required in this template based on the permit conditions.

7. EPA COMMENT

The last sentence on page 4, under section V, Permit Shield, contains a typographical error: "A permit shield is granted from ~~this~~ these requirements....".

DISTRICT RESPONSE

This typographical error has been corrected.

8. EPA COMMENT

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In the second question on the Template Qualification Form (TQF), the citation should also include NSPS subpart KKK, since both KKK and LLL use the same dates to define affected facilities and the template provides a permit shield from both regulations.

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DISTRICT RESPONSE

The cite in this question has been amended to include both NSPS subparts KKK and LLL.

9. EPA COMMENT

The third question in the TQF omits the word “commercial”: “Does the component handle only commercial natural gas....”

DISTRICT RESPONSE

The third question on the TQF has been amended to read, “Does the component handle only commercial natural gas....” In addition, the cite for this clarification has been amended to include section 3.1.2 of Rule 4403, which contains the Rule definition of commercial natural gas.

10. EPA COMMENT

The ASTM method in the fourth question of the TQF should be corrected to read “ASTM Method D-86-78”.

DISTRICT RESPONSE

The ASTM test method in this question has been amended to: ASTM Method D-86-78.

11. EPA COMMENT

The last question on the TQF should be corrected to reflect the District Rule’s exemption for streams with VOC content less than one (not ten) percent by weight.

DISTRICT RESPONSE

This typographical error has been corrected to reflect the exemption of streams with one percent VOC content, from Rule 4403, section 4.2.3.

Comments on Specific Template Conditions:

12. EPA COMMENT

Condition #3 allows the leak detection instrument to be calibrated with two alternative calibration gasses (methane or n-hexane). This is inconsistent with the requirement of District Rule 4403, section 6.3.4, which requires calibration with methane.

DISTRICT RESPONSE

This condition has been revised to require the use of methane for calibration, according to the requirement of District Rule 4403, 6.3.4.

13. EPA COMMENT

Condition #10 contains a grammatical error in the last sentence: “The tag shall remain in place until repair and re-inspection ~~documents~~ document compliance...”

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DISTRICT RESPONSE

This grammatical error has been corrected.

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14. EPA COMMENT

The comma in condition #11 should appear before, not after, the word “whether,”

DISTRICT RESPONSE

The punctuation has been corrected as suggested, for sentence clarity.

15. EPA COMMENT

The reference to “this rule” at the end of the first sentence of condition #13 should be changed to “this permit.”

DISTRICT RESPONSE

This sentence has been amended to read, “The number of leaks of a component type shall not exceed one component, or two (2) percent of the total number of components of that type that were inspected, whichever is greater, and that are subject to the requirements of this permit.”

16. EPA COMMENT

Condition #15 refers to the leaking limits in “District Rule 4403, 3.2.1 or 3.3.1, as applicable.” The reference to 3.2.1 should be deleted. Additionally, the phrase in this condition should be amended to read, “and if the leak which has been minimized still exceeds the limit in this permit...”

DISTRICT RESPONSE

Since condition #2 of this template establishes the leak limits, pursuant to District Rule 4403, 3.3.1, the District agrees it is not necessary to reference this section of Rule 4403 in template condition #15. This condition has been amended to read, “If the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days, and if the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [District Rule 4403, 5.3.1.1].”

17. EPA COMMENT

Condition #16 incorrectly cites District Rule 4403, 5.1.4 and 5.1.5, in addition to sections 5.2.7, 5.2.8, and 5.2.9. This condition should be revised to read, “Any component leak identified by a Notice to Repair issued by the District shall be repaired and re-inspected as specified in the permit....”

DISTRICT RESPONSE

The reference to District Rule 4403, 5.1.4 and 5.1.5, has been deleted from this condition since it applies to light crude oil and gas production facilities, which are not addressed by this template. However the specific reference to the repair and re-inspection requirements of District Rule 4403, 5.2.7, 5.2.8, and 5.2.9 for gas

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processing plants will remain in this condition. The District maintains this is necessary to insure that what is being required by this condition is clear and accurate.

18. EPA COMMENT

The correct citation in condition #17 is section 6.2.1, not 6.2.2.

DISTRICT RESPONSE

This citation has been corrected to District Rule 4403, 6.2.1.

19. EPA COMMENT

Condition #19 has a typographical error. There should not be an underlined period after ASTM Method 169-63.

DISTRICT RESPONSE

This typographical error has been corrected.

20. EPA COMMENT

Condition #21 refers to the determination of the True Vapor Pressure (TVP) of organic liquids, which is a defining parameter for light crude oil and gas production facilities. This condition should be removed.

DISTRICT RESPONSE

This condition has been removed from the template, since it is not applicable to natural gas processing facilities.

21. EPA COMMENT

In condition #24, the District should provide the adoption and amendment date (if any) for county rules 108, 108.1, and 110 to clarify the exact versions of these rules to which the permit shield is applicable.

DISTRICT RESPONSE

Since these counties have been incorporated into the District, it will not be possible for subsequent versions of these county rules to be adopted into the SIP. Therefore, the District feels it is clear, without providing the adoption and amendment date, that the permit shield for any county rule applies to the last version of the rule in the State Implementation Plan (SIP). Please note the District has consistently provided adoption or amendment dates for District rules but not for county rules in earlier approved templates.

22. EPA COMMENT

The phrase, "formerly Rule 465.3," should be added to the end of the first sentence of condition #25 to be consistent with the practice in other templates and to ensure a clear understanding of the evolution of District Rule 4403.

DISTRICT RESPONSE

TEMPLATE SJV-GP-1-0

The phrase, “formerly District Rule 465.3,” has been added to the end of the first sentence of condition #25 for consistency and clarity.

APPENDIX D

PUBLIC COMMENTS / DISTRICT RESPONSE FOR TEMPLATE # SJV-GP-1-0

PUBLIC COMMENT / DISTRICT RESPONSE

Public comments were received from LUFT Engineers & Environmental Consultants, Inc. on behalf of ARCO Western Energy regarding gas plant template SJV-GP-1-0. These comments are encapsulated below followed by the District's response. Copies of the comments are available upon request at the District office.

Comments on Specific Template Conditions:

1. PUBLIC COMMENT

Condition 3 allows the hydrocarbon detection device to be calibrated using methane or n-hexane. Later, condition 22 limits the calibration gases to methane. These conditions should be made consistent.

DISTRICT RESPONSE

Condition #3 has been revised to require the use of methane for calibration, pursuant to the requirement of District Rule 4403, section and 6.3.4.

2. PUBLIC COMMENT

The last sentence of condition 5 refers to "this rule" instead of "this permit".

DISTRICT RESPONSE

In condition #5, as well as in condition #13, the words, "this rule" have been replaced with the words, "this permit".

3. PUBLIC COMMENT

Condition 16 requires a leak be repaired and re-inspected in accordance with District Rule 4403, 5.1.4, 5.1.5, 5.2.7, 5.2.8, and 5.2.9. Sections 5.1.4 and 5.1.5 do not apply to gas plants and therefore should not be referenced.

DISTRICT RESPONSE

The reference to sections 5.1.4 and 5.1.5 of District Rule 4403 has been removed from this condition.

4. PUBLIC COMMENT

The fourth criteria on the Template Qualification Form refers to a "written heavy liquid inspection list". Heavy liquid components do not have to be inspected pursuant to Rule 4403. The District should consider referencing the operator management plan instead.

DISTRICT RESPONSE

TEMPLATE SJV-GP-1-0

The fourth criteria on the TQF has been revised to include the following statement, “Does the component exclusively handle heavy liquid streams which have less than ten (10) percent by weight evaporation at 150°C as determined by ASTM Method D-86-78, and is the component so identified in the operator management plan....” However, please note District Rule 4403, section 4.2.5, exempts components from the requirements of this rule, **excluding** sections 5.2.7, 5.2.8, 5.2.9, 5.3, 6.2, and 6.4, which do require leak inspections for these heavy liquid components.

5. PUBLIC COMMENT

The fifth and sixth criteria on the Template Qualification Form appear to be directed at light oil and gas production facilities and not gas plants.

DISTRICT RESPONSE

The District has removed these two criteria from the Template Qualification Form, since they address exemptions for light oil and gas production facilities which are already excluded from using this template in the first criterion.

6. PUBLIC COMMENT

The last question on the Template Qualification Form cites a VOC limit of ten percent instead of one percent per District Rule 4403, 4.2.3.

DISTRICT RESPONSE

The typographical error in this question has been corrected to reflect the exemption of streams with one percent VOC content, pursuant to District Rule 4403, 4.2.3.

APPENDIX E

TEMPLATE QUALIFICATION FORM
FOR
TEMPLATE # SJV-GP-1-0

TEMPLATE SJV-GP-1-0

Title V General Permit Template Qualification Form

District permit # _____

Please answer the questions in the table below. Natural gas processing components which meet the criteria of this table are qualified to use this template as part of a Title V application. To use this template, remove this sheet and attach to application.

Yes	No	Description of Qualifying Units
		Is the component part of a natural gas processing facility (i.e. engaged in the separation of natural gas liquids from field gas and/or fractionation of natural gas liquids to natural gas products, such as ethane, propane, butane, and natural gasoline)? [District Rule 4403, 2.0 and 3.3.2] If "yes", then continue to next question; otherwise STOP - you cannot use this template.
		Did construction, reconstruction, or modification of the component commence on or before January 20, 1984? [40CFR60 Subparts KKK and LLL] If "yes", then continue to next question; otherwise STOP - you cannot use this template.
		Does the component handle only commercial natural gas with less than 10% by weight VOC as determined by ASTM Methods E-260-73, E-168-67, or E-163-63? [District Rule 4403, 3.1.2 and 4.2.6] If "no", then continue to next question; otherwise STOP - you cannot use this template.
		Does the component exclusively handle heavy liquid streams which have less than ten (10) percent by weight evaporation at 150°C as determined by ASTM Method D-86-78, <u>and</u> is the component so identified in the operator management plan? [District Rule 4403, 4.2.5] If "no", continue to next question; otherwise STOP - you cannot use this template.
		Does the component handle streams with a VOC content (excluding ethane if the ethane stream being handled is less than 20 percent by volume) less than one (1) percent by weight, as determined by the test methods in District Rule 4403, 6.3.1, <u>and</u> is the component so identified in the operator management plan? [District Rule 4403, 4.2.3] If "yes", STOP - you cannot use this template; otherwise you qualify to use this template

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true, accurate, and complete, and 2) the facility is in compliance with this template's permit conditions:

Signature of Responsible Official

Date

Name of Responsible Official (Please print)